

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Parker Tirrell, by her parents and next friends Sara Tirrell and Zachary Tirrell, *and*

Iris Turmelle, by her parents and next friends Amy Manzelli and Chad Turmelle,

Plaintiffs.

v.

Civil Action No. 1:24-cv-00251-LM-TSM

Frank Edelblut, *in his official capacity as Commissioner of the New Hampshire Department of Education;*

Andrew Cline, Kate Cassady, Ann Lane, Philip Nazzaro, Rajesh Nair, James Fricchione, and James Laboe, *in their official capacities as members of the New Hampshire State Board of Education;*

Pemi-Baker Regional School District;

Lisa Ash, Bernice Sullivan, Sheila Donahue, Tony Torino, Carolyn Varin, Peter Jackson, Phil McCormack, Greg Aprilliano, Bonnie Acton, Barbara Noyes, Paul Ciotti, and Paul Pizzano, *in their official capacities as members of the Pemi-Baker Regional School Board;*

Pembroke School District; and

Andrew Camidge, Gene Gauss, Kerri Dean, and Melanie Camelo, *in their official capacities as members of the Pembroke School Board,*

Defendants.

PARTIALLY¹ JOINT PROPOSED BRIEFING SCHEDULE ON THE

¹ This document is filed jointly by the Plaintiffs, State Defendants, and Pembroke Defendants.

MOTION FOR PRELIMINARY INJUNCTION

The Parties hereby submit their proposed briefing schedule for the preliminary injunction motion:

1. State Defendants' Objection to the Motion for Preliminary Injunction: **Saturday, August 24, 2024.**
2. Plaintiffs' Reply: **Monday, August 26, 2024.**

Further, the State Defendants stipulate as part of this agreement that they "will not be presenting evidence of our own at that hearing and do not intend to contest the plaintiffs' evidence."

The State Defendants and Pembroke Defendants assent to the entry of this schedule. Counsel was not able to determine the position of the Pemi-Baker Defendants as of the time of this filing.

WHEREFORE, Plaintiffs respectfully request that this Court:

1. Grant the schedule proposed above; and
2. Grant such other relief as is just and proper.

Respectfully submitted,

Parker Tirrell and Iris Turmelle

By and through their attorneys,

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*Applications for admission *pro hac vice* to follow.

August 21, 2024

Certificate of Service

I certify that on today's date I served a copy of the foregoing on counsel by filing the same through the Court's ECF system.

/s/ Henry Klementowicz
Henry Klementowicz